

**In the Matter Of:**

**FARID vs TRUSTEES OF DARTMOUTH COLLEGE**

23-cv-426-SM

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**AMRO FARID**

*January 10, 2025*

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January 10, 2025

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

AMRO FARID,

Plaintiff,

v.

C.A. 23-cv-426-SM

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

~~~~~

VIDEO DEPOSITION OF  
AMRO FARID

January 10, 2025

9:10 a.m.

111 Amherst Street  
Manchester, New Hampshire

Sharon Saalfeld, CSR, RDR, CRR

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APPEARANCES OF COUNSEL

On Behalf of the Plaintiff, Amro Farid:

JOSEPH SULMAN, ESQ.  
LAW OFFICE OF JOSEPH SULMAN  
255 Bear Hill Road  
Waltham, Massachusetts 02451  
617.521.8600  
jsulman@sulmanlaw.com

On Behalf of the Defendant, Trustees of Dartmouth  
College:

PIERRE A. CHABOT, ESQ.  
STEPHEN ZAHARIAS, ESQ.  
DEVINE MILLIMET & BRANCH  
111 Amherst Street  
Manchester, New Hampshire 03101  
603.669.1000  
pchabot@devinemillimet.com  
szaharias@devinemillimet.com

Videographer: Alex Jandrow

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By Mr. Chabot

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## DEPOSITION OF AMRO FARID

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VIDEOGRAPHER: We are now going on the record. This is the video-recorded deposition of Amro Farid being taken in the matter of Farid versus Trustees of Dartmouth College. This deposition is being held at 111 Amherst Street, Manchester, New Hampshire, on January 10th, 2025. The time is 9:10 a.m. My name is Alex Jandrow. I'm the videographer. And the court reporter is Sharon Saalfeld.

Counsel will introduce themselves for the record and the witness will be sworn.

MR. SULMAN: This is Joseph Sulman, counsel for the deponent, Amro Farid.

MR. CHABOT: And this is Pierre Chabot of Devine Millimet & Branch Professional Association. I represent Trustees of Dartmouth College. Stephen Zaharias, also counsel of record from this firm, is joining me here today.

And before you swear the witness, I just want to confirm, Joe, the usual stipulations. Sometimes there's a misunderstanding about this so I just want to make sure that we have the same understanding, which is that notarization and

1 signature of the transcript are waived. Any errata  
2 to the transcript, however, have to be made by the  
3 deponent within 30 days of the date that the court  
4 reporter delivers the transcript by email to counsel  
5 for the plaintiff. Errata should be notarized and  
6 signed. Any extensions to any of these deadlines  
7 must be in writing and agreed upon by both parties.  
8 Email is a sufficient writing. If no errata are  
9 served within 30 days or such longer time as counsel  
10 may agree, the transcript will be considered to be  
11 correct as transcribed and can be used for all  
12 purposes it can lawfully be used under New Hampshire  
13 law.

14           Objections, except those concerning the  
15 form of questions or those asserting a lawful  
16 privilege, are reserved until the time of the trial  
17 in this matter. And then counsel does not need to  
18 articulate the specific form objection being  
19 asserted, except on request of the examining  
20 attorney.

21           Is that acceptable?

22           MR. SULMAN: Yes, except that I'm not --  
23 I'm not familiar with the requirement to notarize an  
24 errata sheet. I've never done that before.

25           MR. CHABOT: Okay.



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1 MR. SULMAN: So that's not my practice.

2 MR. CHABOT: Okay. I am -- if you will say  
3 on the record that any errata sheet that you deliver  
4 to me may be treated as it is -- as if it is given  
5 under oath, then I can live without a notarization.

6 MR. SULMAN: Yes, it'll be treated as if  
7 under oath.

8 MR. CHABOT: Okay. Thank you.

9 THE REPORTER: And may I clarify? Part of  
10 what you said is that reading and signing will be  
11 waived, but then you spoke about --

12 MR. CHABOT: Of the transcript. Reading  
13 and signing of the transcript. The errata sheet is a  
14 different matter.

15 THE REPORTER: Okay. Thank you.

16 AMRO FARID,  
17 having been first duly sworn, testified as follows:

18 EXAMINATION

19 BY MR. CHABOT:

20 Q. And good morning, Dr. Farid.

21 A. Good morning.

22 Q. Before we get started, I just want to make  
23 sure that if there's anything happening with you  
24 today that would prevent you or impair you from  
25 hearing, processing, or responding to my questions,

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1 would you tell us about that now?

2 A. There's nothing at the moment.

3 Q. Okay. Can you just walk us through your  
4 educational background, starting with high school,  
5 and just walk us through, where did you go to high  
6 school? Where did you go to college? What degrees  
7 do you have?

8 A. I'm from Mansfield, Connecticut. I went  
9 to -- I went to Edwin O. Smith High School in Storrs,  
10 Connecticut. I graduated amongst the very top of my  
11 class. I went to MIT for my undergraduate training.  
12 There I graduated with a degree in -- a Bachelor of  
13 Science degree in mechanical engineering. I also had  
14 minors in economics, political science, and music.

15 After that I continued at MIT in the mechanical  
16 engineering department for a Master of Science  
17 degree. At that point in time, I wanted to study  
18 abroad, so I went and studied in Spain, in Madrid, at  
19 the Universidad Complutense de Madrid, and --

20 Q. Would you be able to spell that for the  
21 court reporter?

22 A. Oh, Universidad is spelled  
23 U-N-I-V-E-R-S-I-D-A-D. Complutense is spelled  
24 C-O-M-P-L-U-T-E-N-S-E. De, is D-E. And then Madrid.  
25 Madrid.

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1 around 2016" is relevant to the tenure denial.

2 Q. Okay. Taking the last of those first, you  
3 note here that Joseph Helble, who was at the time the  
4 dean of the Thayer School; that is correct?

5 A. He was the dean of engineering, yes.

6 Q. Okay. You say around 2016, he discouraged  
7 you from participating in Al-Nur, correct?

8 A. That's correct.

9 Q. He didn't prevent you from participating in  
10 Al-Nur, did he?

11 MR. SULMAN: Objection.

12 You can answer.

13 THE WITNESS: Can you restate the question?

14 BY MR. CHABOT:

15 Q. He didn't prevent you from participating in  
16 Al-Nur, did he?

17 A. He gave as clear of a discouragement as  
18 possible.

19 Q. And what was that discouragement? What  
20 were the -- what did he tell you?

21 A. He told me that he wouldn't want it to  
22 distract me from my tenure case.

23 Q. Did he tell you anything else at the time?

24 A. Yes.

25 Q. What did he tell you?

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1           A.     Well, the meeting was an impromptu meeting  
2 after hours. I was in my office at the Thayer School  
3 of Engineering in the Cummings building, and I had my  
4 door open. It was after 5:00. And he just sort of  
5 showed up. And -- unannounced. There wasn't a  
6 scheduled meeting of any kind. And, you know, came  
7 by to see me, and I welcomed him into my office,  
8 and -- the conversation was a long time ago. The --  
9 but the entirety of the conversation was around the  
10 Al-Nur Muslim Student Association on campus, and the  
11 situation of Muslim students on campus, and my -- my  
12 involvement with them, the involvement of my wife,  
13 Professor Inas Khayal, as well, and the need for a  
14 Muslim chaplain, if you will, a Muslim student  
15 advisor for this student group as is commonplace at  
16 all of the other Ivy League universities.

17           Shall I continue?

18           Joe Helble. When he had this conversation, he  
19 told you that you could participate more fully in  
20 Al-Nur after you went up for tenure, didn't he?

21           A.     He did say that, but that is different than  
22 what he does for other faculty and other student  
23 groups.

24           Q.     What is the basis for you saying so?

25           A.     For example, Doug Van Citters, who was an

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1 assistant professor at the time, had not yet gotten  
2 tenure, was active with the Dartmouth crew or rowing  
3 team, and was very much encouraged to be involved in  
4 their activities. And, in general, there was an  
5 environment at Dartmouth and Thayer for faculty to be  
6 involved, encouraging an active, vibrant student  
7 life, and I felt I was doing that as a member of the  
8 faculty.

9 Q. When was it you say that Doug Van Citters  
10 was encouraged to be involved with crew or rowing?  
11 What time frame?

12 A. As far as I know, the duration of his  
13 assistant professorship. I had had a number of  
14 different conversations with him about his  
15 involvement in crew because I'm also a former rower.

16 Q. Professor Farid, were you aware -- going  
17 back to your interrogatory answer in that paragraph  
18 about the tenure denial. And we'll get back to the  
19 denial of energy system paragraph in a minute. But I  
20 want to focus on the tenure denial paragraph on  
21 page 2.

22 A. Yes.

23 Q. You say that that decision or that denial  
24 involved at least Alexis Abramson, Laura Ray, Lee  
25 Lynd, the Thayer tenured faculty, Joseph Helble, CAP,

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1 that's the committee advisory to the president?

2 A. That's correct.

3 Q. Philip Hanlon, who was the president of  
4 Dartmouth College at the time?

5 A. Yes.

6 Q. And possibly more individuals, right?

7 A. That's correct.

8 Q. Okay. I want to take each of those one at  
9 a time.

10 With respect to Alexis Abramson, did she ever  
11 make any inappropriate comment to you concerning your  
12 national origin or religion?

13 A. No.

14 Q. Have you become aware in the course of this  
15 case what her recommendation was to the Committee  
16 Advisory to the President with respect to your tenure  
17 application?

18 A. No.

19 Q. You haven't reviewed the discovery  
20 materials that we've produced in that regard?

21 A. Not yet.

22 Q. Okay. How about Laura Ray? Has Laura Ray  
23 ever made an inappropriate comment to you concerning  
24 your religion or national origin?

25 A. No.

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1 Q. How about Professor Lynd, Lee Lynd? Has he  
2 ever made an inappropriate comment to you respecting  
3 your national origin or religion?

4 A. No.

5 Q. We'll cover the tenured faculty. I have a  
6 list that we'll go over later, but I'll skip over to  
7 Joseph Helble. Did he ever make an inappropriate  
8 comment to you concerning your national origin or  
9 your religion?

10 A. I consider what we were just talking about  
11 as in discouraging me from participating in the only  
12 faith group that is within 100 miles as  
13 inappropriate.

14 Q. Anything else?

15 A. No.

16 Q. Okay. I just -- forgive me. Lawyers have  
17 to do this sometimes. So to reiterate, Joseph Helble  
18 didn't make any inappropriate comments to you  
19 concerning your national origin or religion except  
20 when he discouraged you from participating in the  
21 Al-Nur student group in approximately 2016; is  
22 that -- did I characterize your testimony fairly?

23 A. That's correct.

24 Q. Thank you. Do you know who was sitting on  
25 the Committee Advisory to the President at the time

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1 you applied for tenure?

2 A. No.

3 Q. To your knowledge, did anybody who served  
4 on the Committee Advisory to the President make any  
5 inappropriate comments to you concerning your  
6 national origin or religion?

7 A. I don't know who they are.

8 Q. Okay. How about President Hanlon? Did  
9 President Hanlon ever make any appropriate -- sorry,  
10 strike that.

11 Did President Hanlon ever make any inappropriate  
12 comments to you with respect to your national origin  
13 or religion?

14 A. No.

15 Q. Are you aware of President Hanlon making  
16 any inappropriate comments about -- let's start with  
17 individuals who practice the Muslim faith. Are you  
18 aware of him ever making any inappropriate comment  
19 with Muslims?

20 A. No.

21 Q. How about persons of Middle Eastern  
22 national origin?

23 A. No.

24 Q. And, again, that was, to just to be clear,  
25 you're not aware of President Hanlon making any



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1 inappropriate comments about persons of Middle  
2 Eastern national origin, correct?

3 A. I'm not aware of any such statements.

4 Q. Okay. Did you highlight paragraph 14 in  
5 the federal complaint? I'm sorry, strike that. I  
6 was thinking of paragraph 16.

7 Did you highlight paragraph 16 in the federal  
8 complaint?

9 A. Yes, I did.

10 Q. Okay. Is the statement not a single  
11 tenured colleague in the engineering school sought to  
12 collaborate with you on a research project or paper  
13 despite your invitations to do so, is that a  
14 statement that you can adopt under oath here today?

15 A. Yes.

16 Q. And then looking at paragraph 16, I just  
17 want to understand, and I want to make sure that the  
18 jury can understand. You considered the Thayer  
19 School of Engineering to be a prestigious  
20 institution, correct?

21 A. Yes.

22 Q. Thank you.

23 You don't know who, on the faculty, voted for or  
24 against your tenure application, do you?

25 A. No, I don't.

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1 Q. Do you -- did you ever become aware of the  
2 vote tally?

3 A. No.

4 Q. So you were not aware, as you sit here  
5 today, whether the vote was overwhelmingly negative  
6 or overwhelmingly positive?

7 A. I have no idea what the result was other  
8 than binary yes or no.

9 Q. Okay. Are you aware that Joe Helble did  
10 not vote on your tenure case?

11 A. I --

12 Q. Strike that. Are you aware whether Joe  
13 Helble voted on your tenure case?

14 A. I am not aware because I'm not supposed to  
15 know.

16 Q. You were at the meeting where they  
17 deliberated on your tenure case before you were  
18 dismissed, were you not?

19 A. I was at the meeting, at the faculty  
20 meeting. I was at the faculty meeting where -- I was  
21 at the faculty meeting before the tenure review of  
22 myself and maybe another promotion was discussed.

23 Q. Was Mr. Helble in attendance?

24 A. No.

25 Q. The Al-Nur issue back in 2016, did

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1 should continue to proceed with my research,  
2 teaching, and service.

3 MR. CHABOT: I'm going to mark what we'll  
4 call Exhibit 4 here.

5 (Exhibit 4 marked for identification.)

6 BY MR. CHABOT:

7 Q. I'm just going to first ask, Dr. Farid,  
8 whether you recognize this document?

9 A. No. This is the first time I see this  
10 document.

11 Q. Okay. I will represent to you that this  
12 was the faculty roster for the academic year where  
13 your tenure vote -- where your tenure application was  
14 considered.

15 The year that you applied for tenure, only  
16 tenured faculty members were permitted to vote on  
17 your application, correct? Strike that.

18 Only full professors were permitted to vote on  
19 your tenure application; is that correct?

20 A. That's false.

21 Q. Okay. With respect to your tenure  
22 application, was it full professors and tenured  
23 associate professors who voted?

24 A. During that year, Dean Abramson had  
25 initiated a process to change the policies and

1 procedures in the faculty handbook, including  
2 promotion and tenure, and one of the things that was  
3 discussed, and she initiated, was to have -- was to  
4 have associate professors with tenure vote on  
5 associate professors without tenure as a new change  
6 while my tenure review was actually still going on.

7 Q. Did the other associate professors, the  
8 tenured associate professors, vote on your  
9 application, to your knowledge?

10 A. I wasn't in the room, and so I can't say  
11 for certain. And I have not looked at the -- the  
12 evidence produced in discovery whether it has been or  
13 has not, but what I can say is that in that -- it was  
14 discussed. The point of having associate professors  
15 with tenure voting for the year that I was up for  
16 tenure, that was discussed several times, and, in the  
17 end, people supported that idea.

18 Q. Can you take your blue highlighter there --  
19 I see that you have it near at hand already -- and I  
20 would like you to highlight the name of any professor  
21 or associate professor whoever said anything  
22 inappropriate to you concerning your national origin  
23 or religion. Again, just those first two that --  
24 professors and associate professors. You don't need  
25 to worry about assistant professors or the research

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1 and instruction line.

2 I'm sorry, Dr. Farid, are you finished or are  
3 you thinking?

4 A. I'm recalling.

5 Q. Okay. That's fine.

6 MR. SULMAN: Take your time.

7 BY MR. CHABOT:

8 Q. Are you all set?

9 A. Yes.

10 Q. Can you just -- for the record, so I don't  
11 have to reach over and grab your exhibit, can you  
12 tell me which names you highlighted?

13 A. Professor Eugene Santos.

14 Q. Can you please recount for me every  
15 inappropriate comment Professor Santos ever made to  
16 you about your national origin or your religion?

17 A. Well, this was approximately 2018.  
18 Professor Santos and I shared McLane room 232 as a  
19 shared laboratory facility, so the LIINES, the  
20 laboratory for intelligent integrated networks of  
21 engineering systems that I lead, had the middle  
22 section of that shared space, and Professor Santos's  
23 laboratory was just to the left, if you have your  
24 back to the windows.

25 I was -- I was in the lab, and I was -- I

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1 thought I'd reach out to Professor Santos, who had  
2 come in, and invite him to collaborate. We had a  
3 conversation about the possibilities of doing  
4 research around systems engineering and systems  
5 science. And -- and he told me that he -- much of  
6 the work that -- much of the -- many of the projects  
7 that he does require American citizenship, and so he  
8 didn't think I was going to be eligible for  
9 collaborating with him.

10 Now, this is strange, of course, because I am an  
11 American citizen. I was born in Brooklyn, New York.  
12 I've always been an American citizen. And so I  
13 questioned -- I questioned him on that. I said, you  
14 know, "Gene, you know I'm American, right?" And he's  
15 like, "No, I thought you were Emirati." And I  
16 have -- you know, the only way I can imagine that he  
17 came to the conclusion that I was Emirati is because  
18 I had worked in the United Arab Emirates four years  
19 earlier, but now it's 2018, three years on to the  
20 faculty, and I'm working right beside you. It struck  
21 me as odd.

22 Q. Is that the extent of any inappropriate  
23 comment that Professor Santos made about your  
24 national origin or religion?

25 A. I have related the event.

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1 Q. Okay. And there's no other events to  
2 relate, correct?

3 A. No.

4 Q. And then, two years later, you asked to  
5 have Professor Santos serve on your tenure review  
6 committee, correct?

7 A. Correct.

8 Q. At some point prior to your reappointment  
9 in 2018, somebody at the Thayer School made it clear  
10 to you that it seemed likely you were going to need  
11 to use all six years available to you in order to  
12 build a successful tenure case; is that correct?

13 A. Could you say that again?

14 Q. Sure. One of your allegations in that  
15 interrogatory response number 3 involves Dr. Helble  
16 telling you that -- orally telling you that you could  
17 have, you know, potentially a four-year tenure track,  
18 and you seem to take issue with the fact that he  
19 didn't honor that. Am I -- is that fair? You can  
20 look at Exhibit 1 if you like, the interrogatory  
21 responses.

22 A. This is 3. This is 4.

23 Q. Thank you for keeping good order there.

24 A. So you're referring me to Exhibit 1, and  
25 which paragraph?

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1 A. With -- around the first two weeks of  
2 September '21.

3 Q. Okay. And at that time, what was -- you  
4 asked to transfer those funds to the Massachusetts  
5 Institute of Technology, MIT, correct?

6 A. False.

7 Q. Okay. Where did you ask to transfer those  
8 funds in the fall of 2021?

9 A. I was not asking for -- to transfer at all.  
10 I was asking to subcontract.

11 Q. Okay. I will go ahead and assume that  
12 there is an important difference, and I will just  
13 adopt your nomenclature. You asked to subcontract  
14 the funds --

15 A. There's a -- there's a -- there's a  
16 tremendous difference between the two, and it's  
17 imperative that the -- that both counsels and the  
18 jury understand the difference.

19 Q. What does Roman numeral 2 say? Can you  
20 read those words again?

21 A. Denial of transfer/subcontract of CRREL  
22 funding.

23 Q. It uses both terms there, does it not?

24 A. Yes, it does.

25 Q. Okay. And you say the denial of transfer



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1 and subcontract of CRREL funding occurred in the fall  
2 of 2021 in your answer, right?

3 A. That could have been written more  
4 accurately or more correctly. The denial of the  
5 subcontract of CRREL funding occurred in fall 2021.  
6 The transfer would -- the request for transfer would  
7 not occur until August of 2022.

8 Q. Okay. So with respect to the request to  
9 subcontract the CRREL funding --

10 A. Yes.

11 Q. -- in approximately September 2021 --

12 A. Yes.

13 Q. -- that request was to, I guess, issue a  
14 subcontract so that you could use the funding at the  
15 Massachusetts Institute of Technology. Is that a  
16 better characterization?

17 A. Well, I would not -- I would not have the  
18 ability to use the funding myself because I'm not a  
19 principal investigator at MIT, but I would be able to  
20 carry out the work using the human resources  
21 available at MIT through the subcontract.

22 Q. When were you first appointed as a visiting  
23 professor at the Massachusetts Institute of  
24 Technology?

25 A. Sometime in the fall of 2021. I've had

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1 appointments at MIT since fall of 2010.

2 Q. Okay. So if I told you that your  
3 appointment as a visiting professor at MIT was  
4 approximately November 29th or 30th, 2021, would that  
5 be in the realm of reason?

6 A. Somewhere in there. I don't have the exact  
7 start date.

8 Q. It was certainly after you made the request  
9 for the subcontract of CRREL funding to MIT, right?

10 A. The subcontract -- when I am asking for a  
11 subcontract, I am asking in my capacity as a  
12 Dartmouth professor, and not as a visiting professor  
13 at MIT. It's actually entirely irrelevant that I  
14 would be a professor -- visiting professor at MIT  
15 because I -- because visiting professors are not  
16 principal investigators. So I'm -- it's not like I'm  
17 transferring it to myself or -- sorry, subcontracting  
18 it to myself. That's not the case. It's being  
19 subcontracted to Professor Kamal Youcef-Toumi.

20 Q. And that is Y-O-U-C-E-F, dash?

21 A. Dash, T-O-U-M-I.

22 Q. Thank you. And Kamal is K-A-M-A-L?

23 A. That's right.

24 Q. You say here, the next line, that this  
25 denial of subcontract that occurred in fall 2021 that

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1 involved Elizabeth Wilson and David Coates. Do you  
2 see that?

3 A. That's right.

4 Q. What is your understanding of Elizabeth  
5 Wilson's role in deciding not to subcontract funds?

6 A. Well, perhaps most importantly, she's the  
7 one who relayed the information that the -- that the  
8 subcontract could not go -- could not go forward, so  
9 that's probably the most important role that she  
10 played.

11 Q. Do you have any basis to say that Elizabeth  
12 Wilson harbored any animus against you on the basis  
13 of your national origin or your religion?

14 A. No.

15 Q. Okay. Now, the other person you described  
16 there is David Coates. What was your understanding  
17 of -- David Coates was the provost of Dartmouth at  
18 this time; is that right?

19 A. That's right.

20 Q. What was -- what is -- strike that.  
21 What is your understanding of Provost Coates'  
22 role -- Coates' role in the decision not to  
23 subcontract funds to MIT?

24 A. Well, when Professor Wilson relayed the  
25 decision that the subcontract would not -- would not

1 go forward, she referred to the provost's office  
2 repeatedly, and so the provost at the time is, you  
3 know, Professor Provost Coates, and so I can only  
4 assume that it was his decision. She also  
5 specifically mentioned Dean Madden, who is also in  
6 the provost's office. I believe his title is vice  
7 provost of research. And so both of them, as far as  
8 I can tell from Professor Wilson's -- my meeting with  
9 her, were the ones who ultimately made the decision.

10 Q. You don't have any direct knowledge that  
11 Dr. Coates personally played any role in that  
12 decision, do you?

13 A. As is customary in universities, people  
14 refer to the office taking an action rather than an  
15 individual taking an action, and so in this case,  
16 Professor Wilson said "The provost's office took this  
17 action," and then I asked multiple times who, and --  
18 and she did mention once also Dean Madden.

19 Q. But she didn't mention David Coates?

20 A. No.

21 Q. Thank you. Have you ever had any  
22 interaction with David Coates that would make you  
23 think that he harbored any animus against you on the  
24 basis of your national origin or religion?

25 A. No.

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1 And, by the way, Dean Madden, Dean is his first  
2 name, not his title.

3 Q. Thank you for the clarification. Dean  
4 Madden is a professor, but he works in the provost's  
5 office. He is not an academic dean.

6 A. But he is the vice provost of research as  
7 well.

8 Q. You mention -- and this is now on page 3.  
9 You say the only other professor for whom Dartmouth  
10 denied a transfer or subcontract concerning this  
11 grant was only a co-PI for a very small portion of  
12 the project.

13 Do you see that?

14 A. Yes.

15 Q. Is that talking about the CRREL grant, the  
16 Cold Research -- sorry. The Cold Regions Research  
17 and Engineering Laboratory?

18 A. Yes.

19 Q. Who, to your knowledge, requested a sub  
20 award -- I'm sorry a subcontract of any portion of  
21 the CRREL grant and received it? You mentioned  
22 somebody was denied the ability to subcontract some  
23 of those funds. Did anybody successfully subcontract  
24 any funds from this grant that you're aware of?

25 A. I'm not aware of anyone -- excuse me. I

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1 if I hadn't already spoken to her. And she told me  
2 that subcontracts at Thayer and Dartmouth are  
3 commonplace, and she was not aware of any reason why  
4 a subcontract would not be approved.

5 Q. You're answering a slightly different  
6 question than I'm asking, though. What I'm asking is  
7 are you aware of anybody who has successfully  
8 subcontracted funds from the same type of grant as  
9 the CRREL grant?

10 A. My role at the Thayer School of Engineering  
11 does not afford me the privilege of knowing about  
12 other people's grants. It's not something I'm  
13 allowed to have information or access to.

14 Q. How about at Stevens Institute of  
15 Technology? Did you -- the Stevens Institute of  
16 Technology allow you access to that kind of  
17 information there?

18 A. Other people's grants?

19 Q. Yeah.

20 A. No.

21 Q. Now, a transfer, right? Because you did  
22 request a transfer of these same funds to the Stevens  
23 Institute of Technology?

24 A. Yes.

25 Q. I think you said that was -- forgive me --

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1 A. August 2022.

2 Q. -- August 2022. The same month you  
3 announced your resignation from the Thayer School of  
4 Engineering, correct?

5 A. Yes.

6 Q. Are you aware of anybody who has been  
7 permitted to transfer funds from the type of grant --  
8 the same type of grant as the CRREL grant?

9 A. The -- I find it difficult to answer the  
10 question because I'm not -- I don't understand what  
11 you mean by "the CRREL type of grant."

12 Q. Okay.

13 A. Right?

14 Q. Okay. That's a fair -- that's a fair  
15 characterization. Now, you did say earlier that your  
16 role at Thayer and your role at Stevens Institute of  
17 Technology didn't allow you access to information  
18 about other people's grants, correct?

19 A. That's correct. Myself and --

20 Q. Okay.

21 A. -- any other, you know, faculty like  
22 myself.

23 Q. Would you characterize the CRREL grant as  
24 one that was competitively awarded?

25 A. Yes.

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1 Q. Okay. What is the basis for that?

2 A. There was a broad agency announcement with  
3 a solicitation requesting proposals for funding.

4 Q. Okay. And that's -- that is the basis that  
5 you say that this was competitively awarded funding?

6 A. All of the -- all of the research funding  
7 where there is a solicitation and professors need to  
8 submit proposals to answer an open call, yes, I would  
9 call that competitive.

10 Q. Okay. You list -- back in Exhibit 1, was  
11 anybody other than -- at least to your knowledge, was  
12 this the same group, Elizabeth Wilson and David  
13 Coates, who was involved in denying your request to  
14 transfer the CRREL funds to the Stevens Institute of  
15 Technology?

16 A. I made the request to transfer the CRREL  
17 funding in writing. I believe that in that email,  
18 Jodi Harrington and Jill Mortali were the recipients  
19 of the email, so -- so it was really being made to  
20 Jill Mortali. I made a similar request for my NSF  
21 funding. The NSF transfer went through successfully,  
22 but I never got a -- I never got a response, again,  
23 as far as I recall, I never got a response that said,  
24 "We will not be transferring it," and there was not  
25 an explanation from Jill Mortali's office of



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1 sponsored programs.

2 Q. But you were able to transfer the NSF  
3 funding, correct?

4 A. That's right.

5 Q. Was that the NSF EAGER grant that you still  
6 have open at the Stevens Institute of Technology?

7 A. It is the NSF EAGER SSDIM project that I  
8 had opened at Stevens Institute of Technology. It's  
9 now since closed.

10 Q. When did it close?

11 A. As far as I recall, September 2023.

12 Q. Did you request the transfer of any other  
13 funding at the time, August 2022, when you announced  
14 your resignation from the Thayer School of  
15 Engineering?

16 A. Those are the only two federally funded  
17 projects that I had, and so I requested both.

18 Q. Have you ever had any personal interactions  
19 with Jill Mortali?

20 A. We've shared many emails.

21 Q. Okay.

22 A. But I actually -- I don't believe I've met  
23 her in person.

24 Q. Do you have any basis to say that Jill  
25 Mortali harbors any animus against you because of

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1 A. No.

2 Q. You began looking for employment at the  
3 Stevens Institute of Technology -- strike that.

4 You applied for employment at the Stevens  
5 Institute of Technology in March of 2022, correct?

6 A. Approximately that time, that's correct.

7 Q. And they did ultimately offer you a tenured  
8 faculty position there, correct?

9 A. Verbally.

10 Q. I mean, verbally just means with words, so  
11 I would agree --

12 A. Orally.

13 Q. Okay. They gave you a written offer letter  
14 at some point in August of 2022, correct?

15 A. It was either right at the end of July or  
16 right at the beginning of August.

17 Q. Okay. July or August 2022 they put an  
18 offer in writing, and that offer contained salary  
19 terms, correct?

20 A. Correct.

21 Q. And it outlined the benefits that would be  
22 provided to you, correct?

23 A. Correct.

24 Q. And it outlined your teaching obligations,  
25 presumably?

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1 did not -- because Dartmouth didn't transfer the  
2 CRREL money?

3 A. No.

4 Q. Okay. What is your current annual salary  
5 at the Stevens Institute of Technology?

6 A. I just got a -- I just got a raise. I'm  
7 not sure the exact figure. Somewhere around  
8 \$190,000.

9 Q. Is that a 12-month or a nine-month  
10 position?

11 A. That is a nine-month position.

12 Q. Do you -- do you have any opportunities at  
13 Stevens to earn additional money during the three  
14 months off?

15 A. Yes.

16 Q. Do you avail yourself of those  
17 opportunities?

18 A. Yes.

19 Q. Approximately, how many weeks during those  
20 additional three months do you work?

21 A. I use them all.

22 Q. Okay. Are you permitted to use all --  
23 forgive me -- all 12 weeks, approximately, under the  
24 terms of your agreement with Stevens?

25 A. Yeah, three months. 25 percent FTE.

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1 Full-time equivalent is FTE.

2 Q. So is that an additional -- you basically  
3 made your pro rata salary for all of those additional  
4 weeks that you work over the summer? Strike that.

5 I'm not sure it is even the -- are the three  
6 months off during the summer at Stevens Institute of  
7 Technology, is that how that works?

8 A. I have the -- I have the option of securing  
9 additional salary during the summer or the  
10 remaining 25 percent of my salary either directly  
11 through Stevens or indirectly.

12 Q. Okay. And, again --

13 A. Or -- sorry. Directly through Stevens or  
14 directly to my person.

15 Q. Okay. You own a limited liability company,  
16 correct? You're the -- you're at least a -- one  
17 owner --

18 A. That's correct.

19 Q. -- of the membership shares in Engineering  
20 Systems Analytics, LLC?

21 A. That's correct.

22 Q. And you've held yourself out in the public  
23 as the chief executive officer of Engineering Systems  
24 Analytics?

25 A. That's correct.

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1 Q. Okay. Dr. Farid, at one point when the  
2 research misconduct investigation committee was  
3 requesting a live interview with you, you provided a  
4 note that said you weren't able to participate.

5 Do you remember that?

6 A. I do. The note was from Erin Storm.

7 MR. SULMAN: Wait for a question.

8 THE WITNESS: Yeah.

9 MR. CHABOT: This will be Exhibit 20.

10 (Exhibit 20 marked for identification.)

11 BY MR. CHABOT:

12 Q. Is that the note from Erin Storm that you  
13 just referenced?

14 A. Yes. It's a note from Erin Storm who was  
15 acting as my medical practitioner at the time.

16 Q. Okay. What were the medical conditions  
17 that impaired your ability to adequately and  
18 authentically participate in the interview that was  
19 requested?

20 MR. SULMAN: Objection.

21 You can answer.

22 THE WITNESS: I met with Erin Storm and I  
23 elaborated the -- how Dartmouth had been mistreating  
24 me through a tenure denial, a research misconduct  
25 inquiry, the research misconduct investigation, and

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1 to ask him for his input concerning your progress  
2 towards tenure.

3 A. I had done that -- I had done that prior to  
4 this email already.

5 Q. Okay. And what was his feedback at that  
6 time?

7 A. I generally got the sense that I was doing  
8 fine, except for ENGS 22 as the hang-up.

9 Q. Professor Lynd did tell you that that could  
10 be a hang-up?

11 A. He didn't use that word.

12 Q. I'm paraphrasing using your terminology.

13 A. Yeah, yeah. He told me that the student  
14 evaluations of ENGS 22 would certainly be looked  
15 at -- would be looked at negatively, but if you show,  
16 you know, improvement in the student evaluations,  
17 then it should be okay. And that's what I did show.

18 Q. Again, until fall of 2020, correct?

19 A. In the middle of COVID with a brand-new  
20 teaching format, yes.

21 Q. You requested to have Gene Santos and John  
22 Zhang serve as sort of your two-person tenure review  
23 committee, correct?

24 A. Correct.

25 Q. Okay. And that request was honored,

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1 correct?

2 A. Yes. Are we moving on from Exhibit 23?

3 Q. We are moving on from Exhibit 23.

4 A. Okay, thank you.

5 MR. SULMAN: Do you have the time check?

6 VIDEOGRAPHER: Five hours, 54 minutes.

7 MR. CHABOT: Thank you. Mark Exhibit 24.

8 (Exhibit 24 marked for identification.)

9 BY MR. CHABOT:

10 Q. I want to ask whether you recognize the  
11 document first, Professor Farid.

12 A. This -- this document, I'm guessing, is  
13 being taken out of -- out of the context of an email  
14 that I had sent to Dean Abramson. Like, there's no  
15 mark that, you know, I wrote this. I believe I wrote  
16 this. I haven't seen this document in a long time.  
17 But it's being taken out of context of a much larger  
18 email.

19 MR. CHABOT: I'll mark Exhibit 25. You may  
20 want to look at these together.

21 (Exhibit 25 marked for identification.)

22 BY MR. CHABOT:

23 Q. You can take whatever time you need to read  
24 this, Professor Farid, but I just direct your  
25 attention to paragraph 9 on the second page. See if

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1 and retaliation.

2 BY MR. CHABOT:

3 Q. Again, without asking for or trying to  
4 locate the version of the arts and sciences handbook  
5 or the Thayer handbook that was in force in 2016 when  
6 you say that Dean Helble told you that you couldn't  
7 get parental leave because Professor Khayal was also  
8 taking it?

9 A. I tried to access the arts and sciences and  
10 the Thayer faculty handbook, and those were what  
11 were, you know, publicly available through, like, a  
12 Google search.

13 Q. Didn't ask anybody for older copies?

14 A. I wasn't aware of changes being made.

15 Q. So you didn't ask for any older copies?

16 A. I did not ask for copies of something that  
17 I'm not aware of.

18 MR. CHABOT: We'll mark Exhibit 26.

19 (Exhibit 26 marked for identification.)

20 THE WITNESS: All right.

21 BY MR. CHABOT:

22 Q. I assume that you're fairly conversant with  
23 your curriculum vitae and your faculty personal  
24 record, right?

25 A. Yes.



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1 Q. This March 28th, 2021, version, do you have  
2 any reason to dispute that this was the version that  
3 you submitted to the tenured faculty to consider  
4 along with your tenure application? I can ask a  
5 better question.

6 Did you submit this version of your curriculum  
7 vitae and faculty personal record to the tenured  
8 faculty at the Thayer School of Engineering as part  
9 of your tenure application?

10 MR. SULMAN: If you need to look it over,  
11 look it over.

12 THE WITNESS: So I'm looking at the date.  
13 I know that this date is automatically generated. So  
14 it would reflect -- before I even look at its  
15 contents, right, it would -- it would reflect that I  
16 write my CV in something called "lay tech," so it  
17 means that this document was turned into a PDF format  
18 in -- on March -- March 28th, 2021.

19 Now --

20 BY MR. CHABOT:

21 Q. The faculty deliberation on your tenure  
22 vote, that was April 7th, 2021, correct?

23 A. I don't believe I've answered your prior  
24 question, sir.

25 Q. Okay. What I'm trying to ask is whether --

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1 do you know or not, one way or the other --

2 A. Yeah.

3 Q. -- whether this is the version of your  
4 curriculum vitae that was used and relied upon by the  
5 Thayer School of Engineering's faculty in considering  
6 your tenure application?

7 MR. SULMAN: Objection.

8 You can answer.

9 THE WITNESS: I'm trying to answer your  
10 question. I have to go back through my email records  
11 and see when it was that I sent materials to the  
12 tenure review committee. We just spoke -- we just  
13 spoke, in Exhibit 25, about me sending this document  
14 on October 19th, 2020, and it says, in my last  
15 correspondence to you on October 5th, 2020, I sent  
16 you my faculty personal record, which is this  
17 document on October 5th form -- October 4th -- sorry,  
18 October 5th, 2020.

19 I know, from recollection, that I did send  
20 an updated version, and at least once, maybe twice.  
21 I don't recall. I know for sure once. And I don't  
22 know what is the date of that submission. It strikes  
23 me as rather close to when the faculty vote was,  
24 March 28th, 2021.

25 BY MR. CHABOT:

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1 Q. Is it important to you to make sure that  
2 your curriculum vitae was thorough and accurate?

3 A. I -- I did the very best I could to make it  
4 as accurate as possible.

5 Q. Okay. And you knew, at least with the  
6 versions that you submitted to the tenured faculty,  
7 that they would be relying upon that curriculum vitae  
8 in considering your tenure application, correct?

9 A. That's correct.

10 Q. I'd like to take a look at page 19 very  
11 quickly. And I just want to look at item number 5.  
12 Do you see item number 5?

13 A. Yes.

14 Q. And that refers to a paper called a  
15 tensor-based formulation of the heterofunctional --  
16 of heterofunctional graph theory, correct?

17 A. Correct.

18 Q. And it notes that -- so this is in the  
19 section journal papers under review, correct? So  
20 this is something that you have submitted?

21 A. Yes.

22 Q. And in that submission, Prabhat Hegde is  
23 included as the third author, correct? Was he  
24 included as the third author in that submission?

25 A. No, he was not.